

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: NATIONAL BROKERS OF AMERICA, INC., Debtor.	Chapter 7 Bankruptcy No. 19-15488
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JOINT NOTICE OF REMOVAL OF ACTION

Robert H. Holber as Chapter 7 Trustee of National Brokers of America, Inc. (the “NBOA Trustee”) and Jason Scott Jordan (“Jordan”), hereby seek to jointly remove the above-captioned action from the Court of Common Pleas of Berks County, Pennsylvania to this Court pursuant to 28 U.S.C. §§ 1441 and 1452.

1. On August 8, 2014, a complaint was filed in the Court of Common Pleas, Berks County under docket number 14-17117 (the “State Court Case”).
2. On or about September 3, 2019 (the “Petition Date”), NBOA filed a Voluntary Petition for relief under Chapter 7 of Title 11 in this Court.
3. Thereafter, Robert H. Holber was appointed as the Chapter 7 Trustee of NBOA.
4. On December 10, 2019, this Court entered an Order extending the time for parties to remove actions through and including April 2, 2020.
5. Now, the parties seek to remove the State Court Case.
6. The United States District Court for the Eastern District of Pennsylvania (the “District Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, because this action arises in and relates to the NBOA’s Chapter 7 bankruptcy case pending before this Court and, therefore, may be removed pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027.

7. The State Court Case may be referred to this Court from the District Court pursuant to the Standing Order of Reference entered on July 25, 1984 by the District Court.

8. The cause of action to be removed is a core proceeding as defined in 28 U.S.C. § 152(b)(2) as it involves property of the estate pursuant to 11 U.S.C. § 541(a), and it involves matters concerning the administration of the estate (§ 157(b)(2)(A)); allowance of disallowance of claims against the NBOA's estate (§ 157(b)(2)(B)); and other proceedings affecting the liquidation of the assets of the NBOA estate (§ 157(b)(2)(O)). The parties consent to the entry of final judgments or orders by this Court.

9. Accordingly, removal of the State Court Case is appropriate and should be referred to this Court.

Dated: January 30, 2020

FLASTER/GREENBERG P.C.

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